

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARSH USA, INC., a Delaware corporation; and MARSH & MCLENNAN COMPANIES, INC., a Delaware corporation,

Plaintiffs,

vs.

CHAD W. KARASAKI,

Defendant.

CIVIL NO. 08 C.V. 4195 (SGK)

DECLARATION OF MARISSA MANDADO

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I, MARISSA MANDADO, declare:

1. I am a Transaction Specialist with Plaintiff Marsh USA Inc.'s ("Marsh's") Honolulu, Hawaii office.

2. I joined Marsh on January 1, 2002.

3. Before Marsh I used to work with Bank of Hawaii Insurance Services and Aon Risk Services, Inc. Pacific ("Aon") in Honolulu.

4. Since the inception of my employment with Marsh, I have worked in Marsh's insurance brokerage unit.

5. As Transaction Specialist, my job responsibilities have always included submitting insurance applications to the insurers for quotations on property and casualty insurance coverages.

6. From April 2005 through his resignation and subsequent departure from the company in March 2008, Chad W. Karasaki ("Karasaki"), the Head of Marsh's Hawaii office, was the leader of Marsh's insurance broking unit, which included a construction insurance practice.

7. I worked with the Client Executive or Client Advisor in charge of a particular account. In cases where the Client Executive was Karasaki, we discussed the renewal status of the account to develop the most favorable terms and pricing.

8. On April 18, 2008, I received a telephone call from Darlene Amion ("Amion"), a Vice President at Aon in Honolulu. Amion used to work with me when I was at Aon from 1998 until 2001.

9. Amion asked me whether I was interested in joining Aon.

10. I answered that I was not interested, and that I was committed to Marsh.

11. Amion then said "but Chad is here" and asked whether that changed my position.

12. Amion also said that the sky was the limit.

13. I declined to consider Amion's proposals.

14. This was the first time since 2003 that Aon invited me to rejoin their office. In 2003 Van Nakashima of Aon asked me and I declined.

This declaration is made upon personal knowledge and is filed pursuant to 28 U.S.C. § 1746(2). I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 30, 2008 at Honolulu, Hawaii.


MARISSA MANDADO

MARSH USA INC. ET AL. V. CHAD W. KARASAKI (SDNY);
DECLARATION OF MARISSA MANDADO